

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

DR. PRAHBJOT UPPAL,

Plaintiff,

vs.

ROSALIND FRANKLIN UNIVERSITY OF  
MEDICINE AND SCIENCE

Defendant.

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Case No. 15-cv-3806

Judge Ronald A. Guzman

**DEFENDANT ROSALIND FRANKLIN UNIVERSITY OF MEDICINE AND SCIENCE'S  
MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

Defendant, Rosalind Franklin University of Medicine and Science (the "University"), by its undersigned attorneys, moves this Court to dismiss Plaintiff, Dr. Prabhjot Uppal's ("Plaintiff"), Complaint, in its entirety with prejudice, pursuant to Fed. R. Civ. P. 12(b)(6) for the reasons stated in its Memorandum in Support filed herewith and incorporated by reference herein.

Dated: May 20, 2015

Respectfully submitted,

**ROSALIND FRANKLIN UNIVERSITY  
OF MEDICINE AND SCIENCE**

By: /s/ William M. McErlean  
One of its Attorneys

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 20, 2015 a copy of the foregoing **Defendant Rosalind Franklin University of Medicine and Science's Motion to Dismiss Plaintiff's Complaint** was filed electronically. Notice of this filing will be sent to the attorneys of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ William M. McErlean  
William M. McErlean